



State of Arizona
Department of Education
Office of Diane M. Douglas
Superintendent of Public Instruction

Administrative Review Summary Report

School Food Authority Name: Superior Unified School District

CTD: 11-02-15

Site(s): Superior Junior High School

Contact: Melissa Perez, Food Service Director

Review Date: November 17, 2016

Review Period: October 2016

Programs Reviewed:

☒ National School Lunch ☒ School Breakfast ☐ Afterschool Snack
☐ Fresh Fruit & Vegetable ☐ Special Milk

Review Observations & Findings	Technical Assistance Provided	Required Corrective Action
Performance Standard 1: Certification & Benefit Issuance- Critical Area		

No findings.

Performance Standard 1: Meal Counting & Claiming- Critical Area

Meal count totals for the review period did not match the claim for reimbursement. The electronic POS was not operable for one day in October and manual counts from that day were not included in the claim by mistake. This was deemed a non-systemic error and a revised claim was submitted for correction.	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue.	<i>Please provide a written description of the changes that have been made to the system to ensure that POS counts will match the claim for reimbursement.</i>
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Performance Standard 2: Meal Components & Quantities- Critical Area

Vegetable sub-group requirements were not met during the review period. Specifically, a dark green vegetable was not offered during the week of review.	Reviewed vegetable sub-group requirements for the age/grade groups served and types of dark green vegetables. Suggested replacing iceberg lettuce with romaine.	<i>Please provide written assurance that vegetable sub-groups will meet weekly requirements. Please also provide a menu for one full week which demonstrates compliance with vegetable sub-group requirements.</i>
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Performance Standard 2: Dietary Specifications & Nutrient Analysis- Critical Area

No findings.

Meal Access & Reimbursement: Certification & Benefit Issuance

No findings.

Meal Access & Reimbursement: Verification

No findings.

Meal Access & Reimbursement: Meal Counting & Claiming

Daily edit checks are not being conducted appropriately. Specifically, the SFA is only completing a DEC by comparing meals served to the total enrollment and not including a comparison of meals served to the attendance factor adjusted eligible students. Furthermore, the enrollment counts that the SFA is receiving from the office do not accurately reflect the number of students enrolled and receiving meals according to the POS software system. Lastly, the attendance factor was not correct within the software system.

Discussed requirements for completing a DEC. Showed Melissa where she can run DEC reports, how to update the attendance factor, and where to obtain the enrollment count on the software system.

Please provide written assurance that daily edit checks will be conducted to meet these requirements. Additionally, provide a copy of a completed daily edit check worksheet.

Meal Pattern & Nutritional Quality: Offer Versus Serve

No findings.

Meal Pattern & Nutritional Quality: Meal Components & Quantities

Signage which explains what constitutes a reimbursable meal was not displayed to students.

Discussed feasible options for signage and potential content, plan for creating and posting. Printable POS Signage can be found on ADE's website at <http://www.azed.gov/health-nutrition/meal-pattern/>.

Please provide written assurance that signage explaining to students what constitutes a reimbursable has been displayed.

Resource Management

Non-federal funds are not being properly allocated to account for the difference of offering all meals to students at no charge and the Federal reimbursement. Specifically, the SFA did not contribute funds to account for a year end deficit of \$54,291 within the non-profit school food service account.

Reviewed cost differential requirement and special assistance provision agreement with SFA's business manager.

Please provide written assurance that the cost differential requirement for operating a Special Assistance Provision will be adhered to. Please also provide documentation that shows a non-federal source contribution in the amount of \$54,291 being transferred to the non-profit school foodservice account to cover the deficit.

The SFA does not have way to evaluate the cost of an adult meal nor does the price for adult meals (\$3.00) sufficiently cover the overall cost of the meals.	Discussed that the overall cost must include food and labor costs in addition to the value of any USDA foods. Referred to calculation provided in FNS 782-5 for nonpricing programs to determine sufficient adult meal prices (free reimbursement rate + per meal value of donated food assistance). Current per meal value of USDA Foods can be found at http://www.fns.usda.gov/fdd/value-donated-foods-notice .	<i>Please provide a written description of the changes that have been implemented to determine the price of adult meals. Please also provide written assurance that adult meal prices sufficiently cover the overall cost of the meals.</i>
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General Program Compliance: Civil Rights

The USDA non-discrimination statement was not printed on appropriate program materials. Specifically, the statement is not included on the school food service webpage.	Discussed where to find non-discrimination statement on ADE's website at http://www.azed.gov/health-nutrition/civil-rights/ and whether long or short statement would be most appropriate.	<i>Please provide written assurance that all program materials will include the non-discrimination statement.</i>
Procedures for receiving and processing complaints alleging discrimination within the school meal programs do not meet requirements. Specifically, the LEA attempts to resolve complaints internally.	Identified the outside agency to which complaints are forwarded (i.e., SA, FNSRO, FNS Office of Civil Rights, or USDA Office of Civil Rights). Additionally, the SFA's procedures must not indicate that they attempt to resolve the complaint themselves nor can the SFA's complaint process be a prerequisite for accepting a complaint. Procedures for filing a complaint can be found at https://www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer .	<i>Please provide a written description of the updated process and procedures for processing complaints alleging discrimination within FNS School Meal Programs which demonstrates compliance.</i>
The 'And Justice for All' poster displayed at the POS is not the most current poster.	Informed SFA of update and discussed feasibility of obtaining updated copies from ADE at upcoming trainings.	<i>Please provide written assurance that the updated 'And Justice for All' poster will be displayed at the POS.</i>

General Program Compliance: SFA On-Site Monitoring

No findings.

General Program Compliance: Local Wellness Policy

The LWP did not contain goals for nutrition promotion.	Discussed that compliance of the final rule must be implemented by June 30, 2017. Discussed feasible options for nutrition promotion goals that can be written into the LWP. Team Nutrition Resources can be found at http://teamnnutrition.usda.gov .	<i>None required at this time.</i>
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The LWP did not contain policies for food and beverage marketing.	Discussed that compliance of the final rule must be implemented by June 30, 2017. Discussed requirement to include and implement policies that allow marketing and advertising of only those foods and beverages that meet Smart Snacks Standards during the school day. This requirement applies to exterior vending machines, posters, menu boards, coolers, trash cans and cups used for beverage dispensing.	<i>None required at this time.</i>
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A recent assessment of the implementation of the LWP was not provided.	Discussed that compliance of the final rule must be implemented by June 30, 2017. Reviewed requirement to complete an assessment and make results available to the public at least once every 3 years. More information on specifications of the LWP assessment and sample evaluation tools can be found on ADE's website at http://www.azed.gov/health-nutrition/wellness-policy/ .	<i>None required at this time.</i>
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General Program Compliance: Competitive Food Services

Not applicable.

General Program Compliance: Professional Standards

The School Nutrition Program Director did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed. Specifically, the director only planned & completed 10 out of the 12 required hours.	Discussed feasibility of completing the remaining 2 hours. Referred to the Institute of Child Nutrition's Online Course System which can be utilized to supplement ADE's trainings and can be found online at http://www.nfsmi.org/Templates/TemplateDefault.aspx?qs=cEIEPTM= .	<i>Please provide the expected date that the training requirement will be met as well as the name, date, and content information of trainings that the School Nutrition Program Director is registered for.</i>
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The School Nutrition Program Manager did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed. Specifically, only 8 of the 10 required hours have been planned & completed.	Discussed feasibility of completing the remaining 2 hours. Referred to the Institute of Child Nutrition's Online Course System which can be utilized to supplement ADE's trainings and can be found online at http://www.nfsmi.org/Templates/TemplateDefault.aspx?q=cEIEPTM= .	<i>Please provide the expected date that the training requirement will be met as well as the name, date, and content information of trainings that the School Nutrition Program Manager is registered for.</i>
Professional Standards training hours are not being tracked sufficiently. Specifically, the SFA is retaining some sign in sheets and notes on what/when trainings were provided. This system does not ensure compliance with completed/planned hours.	Referred to ADE's Training Tracking forms found on ADE's website at http://www.azed.gov/health-nutrition/usda-professional-standards-new/ . Discussed maintaining a binder with copies of sign in sheets and certificates accordingly. Also showed SFA where to obtain certificates of trainings completed with the ADE via ADE Connect.	<i>Please provide written assurance that Professional Standards training hours will be tracked to meet requirements. Additionally, provide a copy of the tracker that will be used with updated information on training requirements. You may simply provide the updated tracker(s) (if completed with each employee) to satisfy all corrective action for Professional Standards.</i>

General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

Temperature for food storage areas are not being observed and recorded. Specifically, temperatures are not taken within the milk cooler.	Reviewed temperature keeping requirements for all storage areas in the kitchen.	<i>Please provide a temperature log which indicates that milk cooler temperatures are now being observed and recorded.</i>
The food safety plan did not contain all of the required elements. Specifically, a HACCP process was not identified for each menu item.	Discussed required content for the food safety plan.	<i>Please provide written assurance that the food safety plan will be updated to include all required elements.</i>

General Program Compliance: Reporting & Recordkeeping

No findings.

General Program Compliance: School Breakfast Program & Summer Food Service Program Outreach

Families were not notified of the availability of the SFSP prior to the end of the school year.	Discussed other resources within the local area to provide families regarding meals during the summer months when school is not in session. Summer feeding locations can be found at http://www.eatwellbewell.org/ or http://www.whyhunger.org/ .	<i>Please provide a description of how families will be notified of the availability of the SFSP prior to the end of the school year, and written assurance that this will occur. If you do not plan to operate the SFSP and no other entities reasonably close to your school(s) operate the SFSP, please provide a description of other community resources that will be provided to families prior to the end of the school year.</i>
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Other Federal Program Reviews: Afterschool Snack Program

Not applicable.

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2017 if applicable.

Other Federal Program Reviews: Fresh Fruit & Vegetable Program

Not applicable.

Other Federal Program Reviews: Special Milk Program

Not applicable.

Comments/Recommendations:

Congratulations on completing your Administrative Review! Superior Unified School District is commended on their effort to provide healthy meals to students in a welcoming environment. Thank you for your cooperation and effort during the review process.

To stay on track with NSLP requirements checkout the NSLP at a Glance Calendar & Monthly Checklist on our website at
http://www.azed.gov/health-nutrition/files/2016/07/sy-16_17-nslp-calendar7.20.16.pdf

Training: In-person classes, Web-based training, and How-To guides can be found on ADE's website at
<http://www.azed.gov/health-nutrition/nslp/training/>

Fiscal Action Assessed?

☐ Yes- SBP ☒ No- SBP ☐ Yes- NSLP ☒ No- NSLP

Please submit corrective action response by January 17 to Britni Baran at 1535 W. Jefferson St. Bin #7 Phoenix, AZ 85007.

Britni Baran, MS, RDN

12/15/2016

Reviewer Signature

Date

If you disagree with any finding that affects the claim for reimbursement, you may appeal the decision by following the Administrative Review Appeal Procedures found in your Child Nutrition Programs Guidance Manual.



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